

# EXHIBIT 1

Case:17-03283-LTS Doc#:13455 Filed:06/16/20 Entered:06/17/20 10:22:33 Desc: Main  
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[handwritten:] *Claimant: Ismael Colón Andujar*

*Proceeding number: 17 BK 3283-LTS*

*Claim Number: 20695*

*Claim for money owed under laws passed to which I am entitled due to my years of service from 12-31-1983 to 12-31-2000 as Security Supervisor at the Corporación Azucarera of the Commonwealth, Ponce, and from 3-16-2001 to date as Automotive Mechanic in the Department of Transportation and Public Works in Ponce.*

	<i>Amount owed</i>
<i>(1) Act 89 – July 1995 – El Romerazo</i>	<i>\$30,000.00</i>
<i>(2) Act 96 – July 2002 – Salary increase</i>	<i>\$21,600.00</i>
<i>(3) Act 164 – July 2003 – Salary increase</i>	<i>\$20,400.00</i>
<i>(4) Act 164 – January 2004 – Sila M. Calderon</i>	<i>\$19,200.00</i>
<i>(5) Act - June 2008 – Salary Scale – Steps</i>	<i>\$14,400.00</i>
	<hr/>
	<i>Total = \$105,600.00</i>

*As well as other laws that may apply to me and under which I have not been granted the appropriate compensation.*

*Thank you for your attention to this matter.*

*Sincerely,*

*[signature]*

*[signed:] Ismael Colón Andujar*

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[handwritten:] *Claimant: Ismael Colón Andújar*

*Cell phone: 787-929-9271*

*Address: HC 03 Box 12706*

*Juana Diaz, PR 00795-9525*

*Claim Number: 20695*

*Debtor: Commonwealth of Puerto Rico*

*I am hereby enclosing the following in connection with my claim:*

*(1) Proof that I worked for the Corp. Azucarera of the Commonwealth of PR, in Ponce, as security supervisor from 12-31-198 [cut off] to 12-31-2000.*

*(2) Proof that I have worked for the Department of Transportation and Public Works of Ponce, as automotive mechanic from 5-16-2001 to date.*

*The amount claimed is \$105,600.00*

*Thank you very much for the prompt attention.*

*Cordially*

*[signature]*

*Ismael Colón Andujar*

*Date:*

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Proof of Claim: <CLAIM NUMBER>  
Claimant: <CLAIMANT NAME>

### INFORMATION REQUESTED TO PROCESS YOUR CLAIM

#### Instructions

Please answer all four (4) questions and any applicable sub-questions. Please include as much detail as possible in your responses. Your answers should provide more information than the initial proof of claim. For example, if you previously wrote as the basis for your claim "Ley 96," please elaborate as to the specific laws on which you are purporting to rely, the year the law at issue was enacted, and how and why you believe such particular law provides a basis for your claim. Additionally, if available and applicable to your claim, please provide:

- Copy of a pleading, such as a Complaint or an Answer;
- Any unpaid judgment or settlement agreement;
- Written notice of intent to file a claim with proof of mailing;
- Any and all documentation you believe supports your claim.

Please send the completed form and any supporting documents via email to [PRClaimsInfo@primeclerk.com](mailto:PRClaimsInfo@primeclerk.com), or by mail or hand delivery to the following address:

Commonwealth of Puerto Rico, Supplemental Information Processing Center  
c/o Prime Clerk, LLC  
850 Third Avenue, Suite 412  
Brooklyn, NY 11232

#### Questionnaire

1. What is the basis of your claim?

- ☐ A pending or closed legal action with or against the Puerto Rican government
- ☒ Current or former employment with the Government of Puerto Rico
- ☐ Other (Provide as much detail as possible below. Attach additional pages if needed.)

2. What is the amount of your claim (how much money do you claim to be owed):

3. Employment. Does your claim relate to current or former employment with the Government of Puerto Rico?

- ☐ No. Please continue to Question 4.
- ☒ Yes. Answer Questions 3(a)-(d).

3(a). Identify the specific agency or department where you were or are employed:

[hw:] Security Supervisor at the Corporación Azucarera from 12-31-1983 to 12-31-2000

3(b). Identify the dates of your employment related to your claim:

[hw:] Automotive Mechanic at the Department of Transportation and Public Works from 5-16-2001 to date present

3(c). Last four digits of your social security number: 9263

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3(d). What is the nature of your employment claims (select all applicable):

- ☐ Pension
- ☒ Unpaid Wages
- ☐ Sick Days
- ☐ Union Grievance
- ☐ Vacation
- ☐ Other (Provide as much detail as possible. Attach additional pages if necessary).

*Law 89 – 1995 – Romerazo, Law 96 – 2002 – Rosello, Law 164 – 2003 – Sila M. Calderón, Law 164 – 2004 Salary Increase, Law 109 – 2008 – Salary Scale – Pasos*

4. Legal Action. Does your claim relate to a pending or closed legal action?

- ☒ No.
- ☐ Yes. Answer Questions 4(a)-(f).

4(a). Identify the department or agency that is a party to the action.

N/A

4(b). Identify the name and address of the court or agency where the action is pending:

N/A

4(c). Case number:

N/A

4(d). Title, Caption, or Name of Case:

N/A

4(e). Status of the case (pending, on appeal, or concluded):

N/A

4(f). Do you have an unpaid judgment? Yes / No (Circle one)

If yes, what is the date and amount of the judgment?

N/A

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## OMNIBUS OBJECTION RESPONSE

### I. CONTACT INFORMATION

Name: [hw:] Ismael Colón Andujar

Zip Code: [hw:] HC 03 Box 12706  
Juana Diaz, P.R.  
00795-9525

Res. contact phone [hw:] 787-929-9271

### II. Heading

#### A. Clerk's Office

United States District Court  
Room 150 Federal Building  
San Juan, Puerto Rico 00918-1767

#### B. Commonwealth of Puerto Rico et al (Debtors)

#### C. Proceeding Number: 17 BK 3283 – LTS

#### D. Omnibus Objection to the request for moneys unpaid by the Commonwealth of Puerto Rico.

Number of the Proofs of Claim:

#49762 – Act #89 – Romerazo – Effective July 1, ~~1996~~ 1995

#94057 – Salary Scale – Steps Law, June 6, 2008

#96621 – Act #96 (2002) by Dr. Pedro Roselló – effective July 2002

Act #164 (2004) by Mrs. Sila Calderón – effective January 2004

[hw:] Act #164 (2003) Salary increase – effective July, 2003

III. The Court should not grant the Omnibus Objection, since this is money owed by approval of the following laws by the government of the Commonwealth of Puerto Rico:

Act 89 Romerazo – Effective July 1, ~~1996~~ [hw:] 1995

Salary Scale – Steps Law dated June 6, 2008

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Act #96 (2002) by Dr. Pedro Roselló – effective July, 2002

Act #164 (2004) by Mrs. Sila M. Calderón effective January 2004

#### IV. Supporting Documentation

Includes documents that prove years of service with the Department of [hw:] Transportation and Public Works of ~~Education~~, Puerto Rico, from [hw:] May 14, 2001, until [hw:] the present. [cut off] of work as [hw:] *automotive mechanic*

Corp. Azucarera from 12-31-1983 to 12-31-2000 as Security supervisor. This is being claimed under applicable laws that cover these years of ~~educational~~ service.

Documents are included that prove this claim.

[hw:] (1) *Certification of employment with the Department of Transportation and Public Works of the Commonwealth of P.R.*

(2) *Certification of employment with the Corporación Azucarera of the Commonwealth of Puerto Rico.*

Due to the recent emergency situation due to earthquakes [hw:] *and COVID-19* in Puerto Rico, the responses are being sent on this date. If you need additional information or documents, please contact the undersigned.

[hw:] *Ismael Colón Andujar*  
*Ismael Colón Andujar*

787-929-9271

*Telephone:*

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**DTOP**

COMMONWEALTH OF PUERTO RICO  
DEPARTMENT OF TRANSPORTATION AND PUBLIC WORKS

May 12, 2009

Ismael Colón Andujar  
Automotive Technician  
Ponce Regional Office

[signature]  
Maria M. Trinidad Quiñones  
Director  
Office of Human Resources

[stamp] DEPT. OF TRANSPORTATION  
AND PUBLIC WORKS, PONCE  
**RECEIVED**  
MAY 19, 2009  
OFFICE OF THE DIRECTOR

[stamp] DEPT. OF TRANSPORTATION  
AND PUBLIC WORKS, PONCE  
**RECEIVED**  
MAY 19, 2009  
HUMAN RESOURCES OFFICE

**DECISION ON CONTESTING DATE OF SENIORITY**

On April 29, 2009, you submitted to this Office the Form Contesting Seniority Date in the Public Service. After analyzing the documents you submitted we determined the following:

**STARTING DATE IN THE PUBLIC SERVICE**

FROM	TO	AGENCY	TIME	
			Years	Days
31 Dec 1983	31 Dec 2000	Corporación Azucarera de P.R.	17	0
16 May 2001	31 March 2009	DTOP	7	320

For these purposes, you have a seniority in the public service of **24 years and 320 days.**

If you do not agree with the information above, you have ten (10) business days to file your complaint with the Complaints and Grievances Committee through the Office of Industrial Relations by a delegate or officer of the Appropriate Unit.

Apartado 41269, San Juan, Puerto Rico 00940-1269 \* Tel. (787) 722-2929 Fax: (787) 728-8963



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[illegible] Authority of Puerto Rico  
COMMONWEALTH OF PUERTO RICO  
**Puerto Rico Lands Authority**  
**Santurce, Puerto Rico 00908**

Apartado 9745

TEL. 723-9090

**CERTIFICATION**

I certify that Mr. Ismael Colón Andujar, with Social Security number XXX-XX-9263, worked at the Mercedita Refinery of the Corporación Azucarera de Puerto Rico from March 5, 1984, to December 31, 2000, as an irregular employee, and did not pay into the Retirement System for Employees of the Government and of the Judiciary.

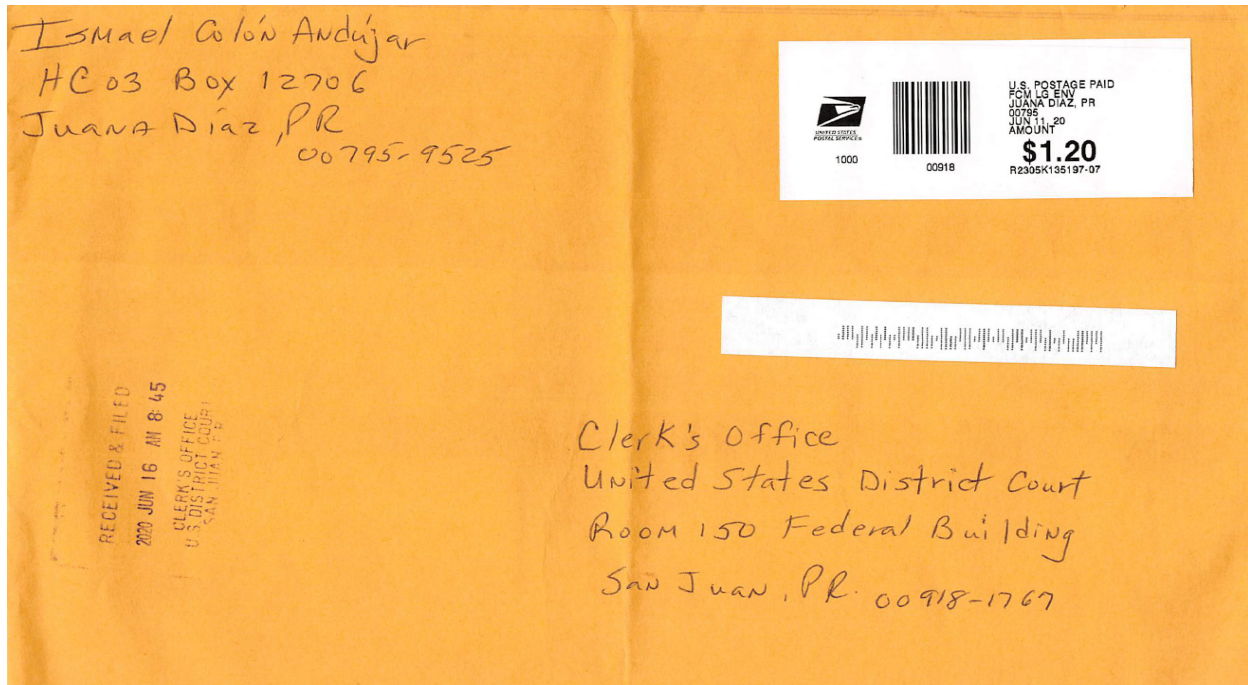
Affirmed for the record that the information provided is correct according to the files kept at our Agency.

This Certification is issued at the request of the [Puerto Rico] Office of Management and Budget in San Juan, Puerto Rico, on this the 29<sup>th</sup> day of April 2009.

[signature]  
Hilda A. Vélez Jiménez  
Interim Director  
Department of Human Resources

HAVJ/scm

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**T** 718.384.8040  
**W** TargemTranslations.com  
**E** projects@targemtranslations.com  
**A** 185 Clymer St. Brooklyn, NY 11211

### TRANSLATOR'S CERTIFICATE OF TRANSLATION

Translation from: Spanish (Puerto Rico) into English (US)  
TARGEM Translations Inc.

I, Andreea I. Boscor, ATA-certified Spanish-English #525556, acting as translator at TARGEM Translations Inc., a NEW YORK City corporation, with its principal office at 185 Clymer Street, Brooklyn, NY, 11211, USA, certify that:

the English translated document is a true and accurate translation of the original Spanish and has been translated to the best of my knowledge.

Original Document Name: Claim No. 20695 - ECF No. 13455 - Mailing Response (3)

Signed this 12<sup>th</sup> day of November 2020



Verify at [www.atanet.org/verify](http://www.atanet.org/verify)

A handwritten signature in black ink, appearing to read "Andreea I. Boscor".

Andreea I. Boscor

